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**BY ECF**

July 21, 2025

The Honorable Pamela K. Chen  
United States District Judge  
United States District Court, Eastern District  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Securities Exchange Commission v. Xia, et al.* U.S. Dist. Ct., Dkt. No. 21-Civ-5350 (PKC) (JAM)

Dear Judge Chen:

We write on behalf of Defendant Richard Xia in connection with the Court's directive at the July 14, 2025 status conference, as reflected in the Minute Entry of that date, which instructed Mr. Xia and his counsel to file any application to unfreeze assets for the purpose of *paying costs required to provide EB-5 investors with documentation necessary to support their USCIS applications* by today, July 21, 2025.

We are still awaiting supporting details and cost documentation from immigration counsel at Global Law Group related to the preparation of investor materials, including for I-829 petitions and responses to Requests for Evidence. We understand that Global Law Group is in the process of finalizing this information and expects to provide it within the coming days. Mr. Xia has followed up and is awaiting their confirmation in order to complete the filing.

Accordingly, we respectfully request a brief extension through **Friday, July 25, 2025** to finalize the application and submit all necessary supporting materials. This short extension will ensure that the motion complies with the Court's directive and provides a clear, complete record for review.

We appreciate the Court's consideration of this request and apologize for any potential delay.

Respectfully submitted,  
/s/ Robert J. Hantman, Esq.

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